

REMARKS

Claims 1, 3-11 and 13-23 are pending in the application. In response to the Pre-Appeal Brief Request for Review, the Examiner has newly rejected Claims 1, 7, 11 and 17 under 35 USC 103(a) as unpatentable over Bobrow in view of Rivette; and has rejected Claims 3-4, 8-9, 13-14 and 18-19 under 35 USC 103(a) as unpatentable over Bobrow in view of Rivette and further in view of Hori. The Examiner has indicated that Claims 5-6 and 10, as well as Claims 15-16 and 20, are objected to but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. For the reasons set forth below, Applicants believe that the remaining claims, Claims 1, 3-11, and 13-23 are allowable over the cited art.

The present application is directed to a method, system, article of manufacture, program storage device, and program product for information processing comprising providing an annotation for multiple page files. The method for providing the annotation includes the steps of obtaining a plurality of page files from a web site; generating a group of the page files which have similar page layout structures, providing a first annotation for an arbitrary

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page file in the group; and correlating the first annotation with at least a part of other page files of the group. The step of generating the group comprises the steps of analyzing the page files to introduce structural descriptive forms for the page layout structures and characteristic values for the structural descriptive forms; using the structural descriptive forms and the characteristic values to calculate an inter-page distance representing a similarity of the page files; and grouping the page files, of which the inter-page distance is equal to or smaller than a predetermined value. Applicants respectfully assert that the cited art does not teach or suggest the invention as claimed.

The Bobrow patent is directed to a system for sorting document images by shape comparisons among layout components. Bobrow takes a document image and applies image segmentation (step 1500 of Fig. 15) to identify layout objects (238 of Fig. 3), such as those listed in Table 1, and then sub-sets the layout objects by attributes (240 of Fig. 3) as taught in paragraph [0144]. Bobrow teaches that OCR may even be conducted to identify specific characters and/or text. Subsequently, in response to user selection of a feature or attribute (1504 of Fig. 15), documents are sorted by the selected feature into groups having

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similarities (steps 1506 and 1508 of Fig. 15). Bobrow teaches that documents are grouped together when the "measurement of their similarity falls within some predefined threshold value [paragraph 0147]. However, Applicants respectfully assert that Bobrow does not teach or suggest that characteristic **values** be assigned to the layout features or the attributes. Bobrow identifies attributes but does not teach or suggest assigning values to those attributes. Further, Bobrow neither teaches nor suggests that an inter-page distance representing similarity is calculated using structural descriptive forms and characteristic values assigned for the structural descriptive forms. Rather, in paragraph [0149] Bobrow teaches that the Hausdorf distance or Hausdorf fraction is used to determine similarity. Hamming distance and weighted XOR are also taught as methods for determining similarity of documents under Bobrow. Bobrow does not, however, teach or suggest that assigned values for structural forms be used in determining similarity among documents.

Applicants further assert that neither Bobrow nor the additionally-cited Rivette patent teaches or suggests the steps of providing a first annotation for an arbitrary page file in the group and correlating the first annotation with at least a part of other page files of the group. What

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Rivette teaches as an annotation is a pointer to a previously-visited web page. That "annotation" is saved to a list which can be displayed to the user, and from which the user can select the annotation for page display. As a concrete example, the user may select the "annotation" <http://www.uspto.gov/web/forms> from a list of previously-visited sites and the system will display the forms page of the USPTO web site without the user having to navigate through multiple pages on the site. Rivette does not, however, teach or suggest grouping page or annotations for pages and does not teach or suggest correlating of an annotation to other pages in a group.

It is well established under U.S. Patent Law that, to establish a *prima facie* case of obviousness, the Examiner must provide references which teach or suggest all of the claim features (*In re Wilson*, 424 F. 2d 1382, 1385, 165 U.S.P.Q. 494, 496 (C.C.P.A. 1970)). Since neither Bobrow nor Rivette teaches or suggests the steps of generating a group of page files by analyzing the page files to introduce structural descriptive forms for the page layout structures and characteristic values for the structural descriptive forms and then employing the forms and values to calculate interpage distances representing similarity and group according to the interpage distances, and since neither

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teaches annotating a page file in the so-generated group and correlating the first annotation with at least part of other page files in the group, it cannot be maintained that Claims 1, 7, 11 and 17 are obvious over the cited art.

With regard to Claims 3-4, 8-9, 13-14 and 18-19, Applicants submit that the additionally-cite Hori reference does not provide those teachings which are missing from the combination of Bobrow and Rivette. The Hori article is cited for its teachings related to layout tags. In rejecting Claim 3, the Examiner concludes that "[i]t would have been obvious to one of ordinary skill in the art to apply Hori to Camut, providing Camut the benefit of using HTML tags to determine the layout of each web page" (paragraph 5 on page 5 of the Office Action). Applicants first note that the Camut reference has not been used in this Office Action and is not appropriately combined with Hori. Clarification of the rejections is requested. Applicants further note that the Hori reference does not teach or suggest assigning character values to structural descriptive forms. HTML tags may identify locations of structural elements, but will not provide the characteristic values taught and claimed for the present application.

In rejecting Claim 4, the Examiner has stated that "Hori mentions that calculations are made for determining

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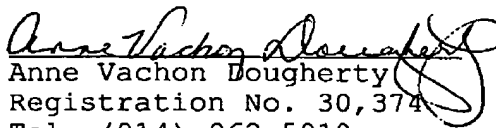
the page files...[i]t would have been obvious to one of ordinary skill in the art to apply Hori to Camut, providing Camut the benefit of ensuring the calculations are right for determining the page files and annotation placement". Once again, Applicants question why reference is being made to the Camut patent. In addition, since Hori does not provide details as to how calculations are made, it cannot be concluded that the addition of Hori to the aforementioned references would obviate the invention as claimed, since none of the cited references teaches the claim feature of assigning characteristic values to structural descriptive forms and none teaches use of characteristic values in determining an inter-page distance.

Based on the foregoing amendments and remarks, Applicants request entry of the amendments, withdrawal of the rejections, and issuance of the claims.

Respectfully submitted,

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